

FILED

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

v.

LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL.

*

Cr. No.

A11CR 693 SS

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I N D I C T M E N T

* [Cts1-2: 18 USC §287 False Claim;
Cts 3-5: 42 USC §408 Misuse SSN;
Cts 6-7: 18 USC §1028A Agg Id.
Theft; Cts 8-9: 18 USC 1343, 1346
Wire Fraud]

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THE GRAND JURY CHARGES THAT:

COUNT ONE

[False, Fictitious or Fraudulent Claim; 18 U.S.C. §287]

On or about January 16, 2007, in the Western District of Texas, the defendant,

LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,

made and presented to the United States Department of the Treasury, Internal Revenue Service, a
claim upon and against the United States, that is, a 2006 Individual Income Tax Return Form

1040, in the name of M.E.W., utilizing Social Security Number XXX-XX-9293, and claiming a tax refund to be paid via electronic funds transfer to a bank account controlled by the defendant in the amount of \$2,865.00, knowing said claim against the United States was false, fictitious and fraudulent in that the true M.E.W., the defendant's mother, was in fact deceased at that time and thus incapable of earning an income, filing a tax return and claiming a refund from the United States, all in violation of Title 18, United States Code, Section 287.

COUNT TWO

[False, Fictitious or Fraudulent Claim; 18 U.S.C. §287]

On or about January 16, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,**

made and presented to the United States Department of the Treasury, Internal Revenue Service, a claim upon and against the United States, that is, a 2006 Individual Income Tax Return Form 1040, in the name of A.E.H., Sr., utilizing Social Security Number XXX-XX-5361, and claiming a tax refund to be paid via electronic funds transfer to a bank account controlled by the defendant in the amount of \$2,865.00, knowing said claim against the United States was false, fictitious and fraudulent in that the defendant falsely represented herself as A.E.H., Sr. to the United States and filed said claim without the knowledge or consent of the true A.E.H., Sr., in

order to secure a federal tax refund payment which the defendant directed to be deposited in her own bank account for her own unjust enrichment, all in violation of Title 18, United States Code, Section 287.

COUNT THREE

[Misuse of Social Security Number; 42 U.S.C. §408(a)(7)(B)]

On or about January 16, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,**

for the purpose of obtaining something of value and for other purposes, and with intent to deceive, falsely represented XXX-XX-9293 to be the Social Security account number assigned by the Commissioner of Social Security to the defendant on a 2006 Individual Income Tax Return Form 1040, when in fact such Social Security account number was not the Social Security account number assigned to the defendant by the Commissioner of Social Security, but was assigned to the defendant's mother M.E.W., who, at the time, was deceased, all in violation of Title 42, United States Code, Section 408(a)(7)(b).

COUNT FOUR

[Misuse of Social Security Number; 42 U.S.C. §408(a)(7)(B)]

On or about January 16, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,**

for the purpose of obtaining something of value and for other purposes, and with intent to deceive, falsely represented XXX-XX-5361 to be the Social Security account number assigned by the Commissioner of Social Security to the defendant on a 2006 Individual Income Tax Return Form 1040, when in fact such Social Security account number was not the Social Security account number assigned to the defendant by the Commissioner of Social Security, but was assigned to the A.E.H., Sr., all in violation of Title 42, United States Code, Section 408(a)(7)(b).

COUNT FIVE

[Misuse of Social Security Number; 42 U.S.C. §408(a)(7)(B)]

On or about November 1, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka**

**LYNETTA SPRUIELL, aka
LYN HILL,**

for the purpose of obtaining something of value and for other purposes, and with intent to deceive, falsely represented XXX-XX-9293 to be the Social Security account number assigned by the Commissioner of Social Security to the defendant on a Renewal Application for Loan Officer License with the Texas Department of Savings and Mortgage Lending, when in fact such Social Security account number was not the Social Security account number assigned to the defendant by the Commissioner of Social Security, but was assigned to the defendant's mother M.E.W., who, at the time, was deceased, all in violation of Title 42, United States Code, Section 408(a)(7)(b).

COUNT SIX
[Aggravated Identity Theft; 18 U.S.C. §1028A]

On or about January 16, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,**

did knowingly use, without lawful authority, one or more means of identification of another person, that is, M.E.W., during and in relation to the felony offense of Misuse of Social Security Number, found at Title 42, United States Code, Section 408(a)(7)(B), all in violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(11).

COUNT SEVEN

[Aggravated Identity Theft; 18 U.S.C. §1028A]

On or about January 16, 2007, in the Western District of Texas, the defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka
LYNETTA SPRUIELL, aka
LYN HILL,**

did knowingly use, without lawful authority, one or more means of identification of another person, namely, A.E.H., Sr., during and in relation to the felony offense of Misuse of Social Security Number, found at Title 42, United States Code, Section 408(a)(7)(B), all in violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(11).

COUNTS EIGHT AND NINE

[Wire Fraud; 18 U.S.C. §1343]

Background Information

At all times relevant to Counts Seven and Eight:

1. The defendant,

**LYNETTA MAE WASHINGTON, aka
LYNETTA WASHINGTON-HILL, aka
M. LYNETTE WASHINGTON HILL, aka
MARY LYNETTA WASHINGTON HILL, aka
LYNETTA MAE HILL, aka
LYNETTA LUCIANO, aka
LYNETTA JACKSON, aka
M. LYNETTA WASHINGTON, aka**

**LYNETTA SPRUIELL, aka
LYN HILL,**

was licensed by the Texas Department of Savings and Mortgage Lending as a loan officer, having fraudulently obtained said licensure by application and renewal using Social Security account number XXX-XX-9293 as her own, when in fact Social Security account number XXX-XX-9293 was not the Social Security account number assigned to the defendant, but was the Social Security account number assigned to the defendant's deceased mother.

2. The defendant was working as a loan officer on behalf of one or more mortgage companies operating in the Western District of Texas and elsewhere.

3. For each mortgage loan application receiving approval that the defendant processed, the defendant stood to gain a monetary payment, fee, commission or other item of value.

4. Financial institutions and mortgage lenders approved mortgage loans for borrowers, relying on qualifying information contained in and supported by the borrowers' loan applications to assess lending risk, including material representations and supporting documentation regarding income, assets, employment, and credit worthiness.

The Scheme

5. From on or about January of 2006 to on or about January of 2009, the defendant devised and intended to devise a scheme to defraud one or more financial institutions and mortgage lenders, and to obtain money and property by materially false and fraudulent pretenses, representations and promises.

Manner and Means

6. It was a part of the scheme that the defendant would obtain and attempt to obtain

mortgage loans funded through wire transactions for client borrowers by inflating and falsifying information to be considered by lenders in the borrower application process regarding borrowers' qualifications for lender approval without the knowledge or consent of the actual borrowers, including, but not limited to employment income, employer identity and location, rental income, marital status, family court and child support documentation, child support income, borrowers' personal assets, and borrowers' intent to occupy the home that was the subject of the residential loan application.

7. It was a part of the scheme that when a mortgage loan that the defendant processed was approved and funded, the defendant expected to obtain a personal gain in the form of a monetary payment, fee, commission or other item of value as the loan officer.

8. On or about each of the dates set forth below, in the Western District of Texas and elsewhere, the defendant, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the writings, signs, signals and sounds described below for each count, affecting the financial institutions described below, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
8	10/25/2006	Monetary wire transmission from Aegis Funding Corporation via Deutsche Bank Trust Company Americas in New York to the Landamerica Commonwealth Title of Austin, Inc. account at Bank of America in Texas in the amount of \$102,365.04 , based upon materially false information and fraudulent misrepresentations provided in mortgage application for residential property at 9812 Teasdale Terrace, Austin, Texas, 78753 on behalf of borrower PJ for Loan No. 2000912778

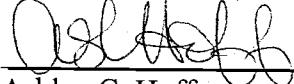
9	05/30/08	Monetary wire transmission from Freedom Mortgage Corporation via JP Morgan Chase Bank in New York to the BDR Title Corporation of Texas account at Bank of America in Texas in the amount of \$262,413.33 , based upon materially false information and fraudulent misrepresentations provided in mortgage application for residential property at 20901 Windmill Ridge Street, Pflugerville, Texas 78660 on behalf of borrower VJ for Loan No. 0082525577
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All in violation of Title 18, United States Code, Sections 1343 and 1346.

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

ROBERT PITMAN
UNITED STATES ATTORNEY
Western District of Texas

By:


Ashley C. Hoff
Assistant United States Attorney